UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SARAH EDMONDSON, et al.,

Plaintiffs,

CIVIL ACTION NO. 20-CV-485

FILED
in the Clerk's Office
U.S. District Court,
EDNY, Brooklyn
Jul 13, 2023, 2:52 AM
Pro Se Office via
Box.com

v.

KEITH RANIERE, et al.,

Defendants.

MOTION TO DISMISS THE THIRD AMENDED COMPLAINT

- 1. I, Nicki Clyne, respectfully submit this Motion to Dismiss the Plaintiffs' Third Amended Complaint (TAC).
- 2. Rather than take the Court's time with an additional submission, I re-iterate the arguments presented in "Motion to Dismiss" filed on January 28, 2022 (ECF No. 178), "Reply Memorandum Of Law In Support Of Defendant Nicki Clyne's Motion To Dismiss The First Amended Complaint" filed on April 11, 2022 (ECF No. 179), and "Declaration In Opposition To Plaintiffs' Motion For Leave To File An Amended Complaint" filed on May 10, 2023 (ECF No. 210).
- 3. The complaint heavily relies on conclusions based on criminal proceedings, of which I was not a defendant, and fails to provide facts to support their allegations against me.
- 4. For the reasons detailed in the above-mentioned filings, the Court should dismiss the Third Amended Complaint with prejudice.
- 5. Additionally, I incorporate the arguments for dismissal made by the other defendants.

Dated: July 12, 2023

Respectfully submitted,
/s/ Nicki Clyne
Nicki Clyne